

EXHIBIT 2

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SCOTT EASOM, ADRIAN HOWARD,	§	
and JOHN NAU, on behalf of	§	
themselves and on behalf of	§	
all others similarly situated,	§	
Plaintiffs,	§	CIVIL ACTION NO.
	§	4:20-CV-02995
V.	§	
	§	
US WELL SERVICES, LLC,	§	
Defendant.	§	

ORAL DEPOSITION OF DAVID SCOTT EASOM

JANUARY 17, 2023

VOLUME 1 OF 1

ORAL DEPOSITION OF DAVID SCOTT EASOM, produced at the instance of Defendant and duly sworn, was taken in the above-styled and numbered cause on the 17th day of January, 2023, from 12:32 p.m. until 4:22 p.m., before Carol S. Temperton, CSR, in and for the State of Texas, reported by stenograph machine, at the offices of McDonald Worley, P.C., 1770 St. James Place, Suite 420, Houston, Harris County, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record.

Page 10

1 the fractures to actually make the fractures larger so
 2 they can retrieve either natural gas or oil out of the
 3 ground.
 4 Q And for Pumpco, were they trying to get
 5 natural gas or oil?
 6 A Oil.
 7 Q Same with US Wells?
 8 A Oil, south here in Texas. When I was up north
 9 in Pennsylvania, that was natural gas.
 10 Q Are you talking about for Pumpco or for US
 11 Wells?
 12 A For US Wells.
 13 Q Okay. Why did you stop working at Pumpco?
 14 A When I started, they had 27 fleets. And then
 15 they had a whole series of injuries and lost customers
 16 because of injuries, and they went down to basically,
 17 like, seven or six fleets. So I could just see on the
 18 wall that they were going to wind up going out of
 19 business with the people not paying attention, not
 20 following safety guidelines, so I just bailed.
 21 Q You voluntarily quit as opposed to being
 22 terminated?
 23 A Yes.
 24 Q Do you know if other people were terminated as
 25 that fleet was reduced from 27 to 6 or 7, or did

Page 12

1 Q Where was he out of?
 2 A Bryan, Texas.
 3 Q And did he -- was he the guy that offered you
 4 the job?
 5 A Yes.
 6 Q Okay. And I think you were looking at your
 7 phone?
 8 A Yeah, I'm still looking for that picture or
 9 that video so I can figure out what time frame that I
 10 worked for Pumpco.
 11 Q When did you start working at US Wells?
 12 A I want to say that would be 2018.
 13 Q Would it be fair to say that you worked for US
 14 Wells within a two-year, give or take, time frame?
 15 Does that sound about right?
 16 A Yes, I worked there for a year and probably
 17 three-quarters.
 18 Q Okay.
 19 A So I worked for Pumpco before that, so I'm
 20 going to say that Pumpco would be like 2017.
 21 Q Okay. The electronics technician manager,
 22 Ralph, did he hire you to be an electronic technician?
 23 A Yes.
 24 Q Was it the same type of job that you had been
 25 doing at Pumpco?

Page 11

1 everybody leave like you?
 2 A Oh, there was people terminated because they
 3 lost those contracts.
 4 Q Do you know if they gave what we refer to in
 5 the lawsuit as WARN Act notice to those people for
 6 Pumpco?
 7 A I have no idea.
 8 Q Were you aware of the WARN Act back when you
 9 were working for Pumpco?
 10 A Huh-uh.
 11 Q I need you to answer out loud.
 12 A Oh, sorry. Nope. That -- yeah, my bad.
 13 Q No problem. Did you go right from Pumpco to
 14 US Wells?
 15 A Yes.
 16 Q How did you find a job there?
 17 A I found that job online through Indeed, I
 18 believe.
 19 Q Do you remember who you interviewed with, if
 20 you did interview with anybody?
 21 A I interviewed with Ralph Seagers.
 22 Q S-I-E-V-E-R-S, is that --
 23 A S-E-A-G-E-R-S.
 24 Q And what was his position?
 25 A He was the electronics technician manager.

Page 13

1 A Yes.
 2 Q What did you start off getting paid at US
 3 Wells?
 4 A \$21 an hour.
 5 Q And were you hired to work in Bryan?
 6 A Yes.
 7 Q And was Ralph your boss?
 8 A Uh-huh, yes.
 9 Q Okay.
 10 A Sorry. I caught myself.
 11 Q Did you work 14 days on, 7 days off?
 12 A Yes.
 13 Q How many hours a day did you typically work?
 14 A Average is about 16 hours.
 15 Q And would that be every day of a 14-day
 16 period?
 17 A Yes.
 18 Q Roughly speaking, what time did you start and
 19 what time did you stop?
 20 A So you start from the time that you leave man
 21 camp, which is typically about 3:30, 4:00 in the
 22 morning. And then it takes like two hours to get to
 23 pad, to some pads. Some pads you get there in an hour.
 24 You have your morning meeting around 7:00.
 25 Q At the pad?

1/17/2023

Page 18

1 A Depends on the oil company that's doing the
2 drilling. It depends on the lease and the lease
3 rights. And probably, I'm going to say, depends on the
4 owner of that property if they want that much stuff
5 done on their property. They -- and if they aren't the
6 original owners and they don't own the mineral rights,
7 then they may not have a choice. But they still assume
8 some kind of payment because, in essence, we are
9 damaging that property on the top.

10 Q When you were referring earlier to Wild Horse
11 and Apache, that's the oil company that drills out of
12 the pad in question and hires US Wells to come do the
13 fracking?

14 A Yes.

15 Q And how far are these pads from the Bryan main
16 base office?

17 A Most everything that I did locally was either
18 in Somerville, which is probably 40 miles, and some
19 stuff was done -- let me look at a map real quick. Let
20 me see. Just give you kind of an example. Where is
21 College Station?

22 MR. YEZIERSKI: It's in Texas.

23 THE WITNESS: Got that.

24 A All right. So we fracked in Brenham,
25 Somerville, Snook, Caldwell. I think Giddings at one

Page 20

1 started there. And then when I got there, he was
2 titled something else. I forgot what it is, but that's
3 where he had his own vehicle and he was doing all the
4 GPS stuff. He did that for probably about a year in
5 that position, and then he came back to being an
6 electronics technician. But I think they actually let
7 him keep his company vehicle.

8 Q You never had a company vehicle?

9 A No.

10 Q And so do you stay at man camps when you were
11 working at these pads that you just talked about a
12 minute ago?

13 A I stayed at man camps when I was moved from
14 Bryan to San Angelo to go work.

15 Q One second. Let me back up before I ask these
16 other questions. You started working at US Wells in
17 the Bryan facility?

18 A The Bryan facility.

19 Q And how long were you there for before you
20 went to the San Angelo?

21 A Maybe six months.

22 Q And then did you spend the rest of your time
23 at the San Angelo?

24 A Most of the rest of my time was San Angelo,
25 except the last two hitches I worked were in

Page 19

1 point. And there's possibly some other cities, but
2 most of these pads are probably 40-plus miles away from
3 the shop. I think there was one pad that actually was
4 like 20 minutes from the shop, so it was there -- say
5 like far north Bryan or something like that.

6 Q (BY MR. KORN) Mr. Howard, who just testified,
7 said he lived close enough that he just drove to the
8 pads in Bryan. In other places he stayed in a man
9 camp.

10 A Yeah, and that's -- that's because he was
11 different from me, and he had a company vehicle. I did
12 not.

13 Q Why did he have one and you didn't?

14 A He actually was an electronic technician, but
15 then he was also another technician that did the GPS on
16 the vehicles, like on all the trucks and the trailers
17 and all that stuff. So he -- he went all over for US
18 Wells, whether it was local or, you know, out of town
19 to go -- anytime the GPS had problems on the truck or
20 the trailer, he was the electronic technician that
21 actually fixed all that stuff. So he -- he had -- he
22 had like a dual purpose, I guess, for his job.

23 Q Was his job title, though, the same as yours,
24 electronic technician?

25 A So he was an electronics technician before I

Page 21

1 Pennsylvania.

2 Q Okay.

3 A But I was still based out of the Bryan office.

4 Q Even when you were at San Angelo?

5 A Yes.

6 Q And how do you know that?

7 A That's -- because I reported to Ralph Seagers,
8 which was my supervisor, I never changed to a
9 supervisor that was in San Angelo.

10 Q Okay. Ralph, did he work at the pad, or did
11 he work at the facility?

12 A He worked at the facility.

13 Q And how would you communicate with him?

14 A Via my phone.

15 Q Phone calls, texts, e-mails, any of the three?

16 A Yes.

17 Q Any and all of the three?

18 A Yeah, any and all.

19 Q Okay.

20 A Everything was done through my phone.

21 Q Okay. When you were working, at least at the
22 pads in the vicinity of the Bryan facility, would you
23 drive to those yourself from your home?

24 A No.

25 Q You would drive to Bryan and then get in a

Page 30

1 on where they were going to go with drilling.
 2 Q Do you remember the names of any of the
 3 friends that you were talking about with Apache?
 4 A It's been so many years I've forgotten most of
 5 these guys' names. One guy's name is Dave.
 6 Q What was his position?
 7 A He was a company man. And when I say
 8 "position, company man," I really don't know anything
 9 other than company man. They're just the ones that run
 10 the pad until, you know, the engineer or the -- or
 11 the -- well, I guess it is the engineer, you know, how
 12 much pressure to pump in the well and, you know, how
 13 many chemicals to put.
 14 Q Okay.
 15 A But, yeah.
 16 Q Where was this meeting that you're talking
 17 about Lee Gibson having with you?
 18 A Lee Gibson --
 19 Q Yeah.
 20 A -- that would be in San Angelo.
 21 Q And was that in the facility conference room?
 22 A Yes. And Lee Gibson was the operations
 23 manager at the time.
 24 Q Do you remember roughly when this was, this
 25 meeting? Was it March of 2020?

Page 31

1 A This meeting would have been February of 2020.
 2 It was right before we finished up fracking for Apache
 3 and closed out, because March was when I went to
 4 Pennsylvania. Actually February, the late part of
 5 February I went to Pennsylvania. And then the next
 6 hitch I went to Pennsylvania was February -- I mean,
 7 March, sorry, which is when I got laid off was that
 8 last hitch. So that would have been like March 18th, I
 9 believe.
 10 Q Yeah, I'm going to show you a letter to you
 11 dated March 18th that addresses your termination. And
 12 so you're saying that you went up to Pennsylvania in
 13 the -- let's call it the three or so weeks before that,
 14 which would bring us to the very end of February. Is
 15 that about right?
 16 A Yes.
 17 Q You did two shifts up there?
 18 A Yes, two two-week hitches.
 19 Q Did you stay up there on your seven days off?
 20 A No.
 21 Q Or did you come back home?
 22 A No, no, I came home.
 23 Q Who -- did you fly or drive home?
 24 A Fly.
 25 Q Did they pay for it?

Page 32

1 A Yes.
 2 Q They being US Wells?
 3 A Yes.
 4 Q Okay. Let's talk about your knowledge,
 5 generally. Not about anybody else's, just your
 6 knowledge. Do you generally have an understanding of
 7 how the price of oil can impact the demand for US Well
 8 Services?
 9 A As far as what? What do you mean by that?
 10 Q Do you know generally that the price of oil, a
 11 sharp decline can impact the demand from customers like
 12 Apache and other clients for fracking services? Do you
 13 know about that?
 14 A I would -- I would say like yes and no. But
 15 when you have a person tell you you have eight months
 16 of work in front of you, you know, why think about
 17 that?
 18 Q Separate and apart from that conversation,
 19 were you aware of US Wells losing customers in that
 20 time frame?
 21 A No, other than Apache saying that "We're going
 22 to shut down for the fourth quarter" or the -- "At the
 23 end of the fourth quarter, we're going to shut down and
 24 we're not going to start back up at the first quarter
 25 of the next year." That's the only one that I know of

Page 33

1 because I don't know all their customers.
 2 Q Do you remember any steps being taken by US
 3 Wells because of COVID-19 with regard to when you were
 4 employed there?
 5 A No. And when you say "steps being taken,"
 6 what do you mean by "steps being taken"?
 7 Q Like having employees take safety precautions,
 8 for example. That would be one question. Did you guys
 9 change any behavior at US Wells because of COVID?
 10 A Not really. The company men at the -- I can't
 11 remember the name of that frac site. Maybe AOG, up in
 12 Pennsylvania, they got to where they wanted us to stand
 13 further apart; but I don't remember anybody, like,
 14 being told to wear masks or any of that stuff.
 15 Q The frac -- the oil company in Pennsylvania
 16 that hired you-all to frac up there, that was -- what
 17 was the name of that company?
 18 A AOG. I really don't remember the name of it.
 19 I think it was AOG, but it may have not been. It could
 20 have been -- I don't really remember that. That's been
 21 too many years ago.
 22 Q Was it the same kind of scenario where you
 23 would stay in a man camp and then get in a van and go
 24 to the fracking site in Pennsylvania?
 25 A Yes, up there they actually had us in a hotel.

1 Q Did it start on January 7th, or did you just
2 pick the 2020 time frame?
3 A I just picked the 2020 time frame.
4 Q So there may be texts prior to 2020?
5 A Yes.
6 Q And what about the March 21st? Is that -- if
7 you look on your phone now, is that the last text you
8 had with him? Like if you --
9 A Oh, yeah. Yes, March 21st.
10 Q Okay. All right. So let's -- we're going to
11 go through these pretty quickly. I just want to -- I
12 have some general questions on the first bunch of
13 pages.
14 A Okay.
15 Q So you -- there seems to be a lot of traffic
16 between you and him about time sheets. Is --
17 A That's how we submitted our time sheets, yes.
18 Q That's how -- what do you mean by that?
19 A When you work at a pad, there's no clock to
20 clock in at, so you have to keep them manually. So you
21 have to write everything down.
22 Q And on Easom 8, is that an example of you
23 writing it down?
24 A Yes, sir.
25 Q And you -- so you say, "I e-mailed it. It

1 in a little bit. I'm going to keep going. So next
2 page, we're still dealing with time sheets and per
3 diems.
4 Look at Easom 12. The bottom there on
5 February 4th, it says, "When do I get a raise?" What
6 was that -- the context for that? Were you expecting a
7 raise?
8 A Yes.
9 Q What made you expect that? Had he told you?
10 A We had been discussing it, and I had asked for
11 a raise, and he was kind of blowing me off on it.
12 Q Did he give it to you eventually?
13 A Yes.
14 Q What was the raise, from what to what?
15 A From 21 an hour to 23.
16 Q Okay. And that was in -- he says, "Come by
17 now and get it if you want." So is that when you got
18 it, presumably, February 7th?
19 A Probably. I really don't remember, but I
20 don't believe it kicked in until really my last two
21 hitches.
22 Q Okay.
23 A Because I filled out the paperwork, and then I
24 don't know what happened after that.
25 Q Got you. On the next -- and then it goes

1 went to your personal e-mail, your Outlook."
2 And he writes, "Don't send it to my
3 personal e-mail. Use my work e-mail."
4 A Yes, and I believe that that was because his
5 work e-mail kicked it back or something.
6 Q Okay. And, look, it's kind of hard to read;
7 but if you look at that time sheet, you see 1, 2, 3, 4
8 days, 45, 45, 45, 48. I think that's what it says.
9 Are those, like, the hours that you worked in a week
10 or -- if you recall. Can you recall what that is?
11 A Let me see if I can see that a little better.
12 Those aren't -- those aren't hourly.
13 Q I don't remember seeing this exhibit. That's
14 why I'm asking about it in this log. So --
15 A That's not -- I mean, that's not a week, you
16 know, because a week is a lot more than that.
17 Q Do you happen to know what this is?
18 A Oh, the 45, 45, those are the -- actually,
19 that is the per diem for each day.
20 Q \$45?
21 A Yes.
22 Q Ah, okay.
23 A Before they reduced it. That's what that is.
24 Okay. Yeah, it took me a second to remember.
25 Q All right. I'm going to come back to per diem

1 into, "Did you get there okay?" Was he -- he's talking
2 about Pennsylvania?
3 A Yes.
4 Q And then --
5 A And, actually, this was -- this would have
6 actually been West Virginia to the Jane Lew yard. On
7 this particular hitch, I went to Jane Lew first, worked
8 at the Jane Lew yard for a week before we actually went
9 to Pennsylvania.
10 Q Is that the only time you worked at Jane Lew?
11 A Yes.
12 Q And it was seven days, half of a hitch?
13 A Yes, we went from here, because we were
14 prepping the pumps to go to the frac pad.
15 Q Okay. Where did you stay for that, a hotel?
16 A Yes. Actually, I believe it was the same
17 hotel that we stayed at because -- no, I take that
18 back. It was -- it was in West Virginia. I take that
19 back.
20 Q Then look at Easom 14. It says at the bottom,
21 "You can get cleaned up before you get on the plane."
22 And you write, "Yeah, hopefully. Will
23 have to repack all this crap and hope one is not over
24 50 pounds. I don't have a scale here. 100 for one
25 pound over is stupid."